

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

STAR AUTO SALES OF BAYSIDE, INC.  
(d/b/a STAR TOYOTA OF BAYSIDE), STAR  
AUTO SALES OF QUEENS, LLC (d/b/a STAR  
SUBARU), STAR HYUNDAI LLC (d/b/a  
STAR HYUNDAI), STAR NISSAN, INC. (d/b/a  
STAR NISSAN), METRO CHRYSLER  
PLYMOUTH INC. (d/b/a STAR CHRYSLER  
JEEP DODGE), STAR AUTO SALES OF  
QUEENS COUNTY LLC (d/b/a STAR FIAT)  
and STAR AUTO SALES OF QUEENS  
VILLAGE LLC (d/b/a STAR MITSUBISHI),

Plaintiffs,

-against-

VOYNOW, BAYARD, WHYTE AND COMPANY,  
LLP, HUGH WHYTE, RANDALL FRANZEN AND  
ROBERT SEIBEL,

Defendants.

Civil Action No.:

1:18-cv-05775-ERK-CLP

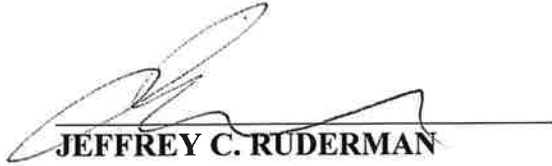
I, **JEFFREY C. RUDERMAN**, hereby declare as follows:

1. I am a partner in the firm of Cyruli Shanks & Zizmor LLP, attorneys for Non-Party Steven McCloskey, and am therefore fully familiar with the facts and circumstances set forth herein. I submit this declaration in further support of the motion to quash the subpoena and in reply to Plaintiffs' opposition to the motion to quash the subpoena.

2. I have read Plaintiffs' opposition to the motion, filed March 15, 2023 (Dkt. 89-90) and Defendants reply in support of the motion, filed March 15, 2023 (Dkt. 92). Defendants' arguments raised in support of the motion fully capture the arguments intended to be raised by Non-Party McCloskey. As such, in reply to Plaintiffs' opposition, rather than subject this Court to multiple filings asserting the same arguments, Non-Party McCloskey respectfully incorporates and adopts the arguments raised by Defendants in Dkt 92, in their entirety.

3. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York  
March 21, 2023



JEFFREY C. RUDERMAN